## TRAUB LIEBERMAN

Mid-Westchester Executive Park | 7 Skyline Drive | Hawthorne, NY 10532 DIRECT (914) 586-7037 | MAIN (914) 347-2600 | FAX (914) 347-7037

Gregory R. Bennett | Partner | gbennett@tlsslaw.com

November 20, 2023

Via ECF

The Honorable Lewis J. Liman, U.S.D.J. Daniel Patrick Moynihan U.S. Courthouse 500 Pearl St., Courtroom 115 New York, New York 100007

Re: Graham Chase Robinson v. Robert De Niro et al.

<u>Civil Action No.: 1:19-cv-09156 (LJL) (KHP)</u>

Dear Judge Liman:

This office, along with Tarter Krinsky & Drogin LLP, represents Defendants Robert De Niro and Canal Productions, Inc. (collectively, "Defendants"). In accordance with the Court's invitation (ECF Doc. #498), Defendants submit this in response to the request by *Insider* Reporter Jason Fisher to be granted access to any exhibits which the Court admitted into evidence during the recent trial (ECF Doc. #479).

As the Court is aware, the parties' respective counsel retained in their possession all electronic or hard copy exhibits which the Court admitted into evidence at trial. Consequently, it is Defendants' understanding that none of those exhibits will be filed on the public docket at any time, and that they will remain governed by the Court's Protective Order (ECF Doc. #23). Aside from the foregoing, the public is free to access any documents from the Court's docket.

Respectfully submitted,

## TARTER KRINSKY & DROGIN LLP

TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP

/s/ Richard C. Schoenstein /s/ Laurent S. Drogin <u>/s/ Brittany K. Lazzaro</u>

/s/ Gregory R. Bennett

cc: All Counsel (via ECF)

NEW YORK NEW JERSEY ILLINOIS FLORIDA CONNECTICUT CALIFORNIA